

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MEDFORD DIVISION

RONNIE DOOLEY and THOMAS
KITTE, individually and on behalf of all
others similarly situated

Case No. 1:12-CV-1207-MC

Consolidated with Case Nos: 1:13-
CV-177-MC & 1:13-CV-395-MC

Plaintiffs,

**AFFIDAVIT OF CHRISTOPHER
WOERNER**

v.

RONALD SAXTON, RODERICK C.
WENDT, R. NEIL STUART, and JELD-
WEN EMPLOYEE STOCK OWNERSHIP
& RETIREMENT PLAN,

Defendants.

AFFIDAVIT OF CHRISTOPHER WOERNER

Pursuant to 28 U.S.C. § 1746, the undersigned attests to the following under the penalties of perjury:

1. My name is Mildred Carrol Powell. I am an adult over the age of 18.
2. I am one of the named plaintiffs in the consolidated *Dooley* action challenging the 2010 amendment and new expenses.
3. When I retained Iazard Nobel LLP at the beginning of this litigation, I executed a retainer agreement which provided that my attorneys could request attorneys' fees.
4. If my attorneys had not been willing to take this suit on contingency and advance the cost of litigation, I would not have filed this suit due to cost of prosecuting this case.
5. I have been involved in the settlement process from the initial mediation through the final settlement agreement. I support the settlement achieved by Co-Lead Counsel.

6. I understand that my attorneys are requesting an award of 30% of the recovery and I support their request.

7. I filed this lawsuit despite the personal risks attendant with being a named plaintiff, including the inevitable publicity from the case, and the considerable responsibility for being a proposed class representative.

8. I have conferred regularly with my attorneys throughout this litigation, including with respect to the filing of the initial complaint and reviewed the draft complaint prior to its filing. I communicated with counsel several times following the filing of the Complaint.

9. I have received updates on the litigation, including discovery requests, and settlement discussions. I have reviewed the details of the settlement in connection with the upcoming Final Approval hearing. I have also gathered relevant documents and provided them to my attorneys throughout the litigation. Had this litigation continued, I was fully prepared to appear for a deposition and testify at trial, if necessary.

10. I have not maintained records which would detail the times spent on the litigation, however, I believe that I have devoted at least twenty-five (25) to thirty-five (35) hours to this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

7/17/15

Chris Woerner

By: Christopher Woerner